

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ANSELL HEALTHCARE PRODUCTS LLC,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 06-527 (JJF)
)	
TILLOTSON CORPORATION,)	
)	
Defendant.)	
)	
<hr/> ANSELL PROTECTIVE PRODUCTS INC.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 07-93 (JJF)
)	
TILLOTSON CORPORATION,)	
)	
Defendant.)	

PLAINTIFFS' UNOPPOSED MOTION FOR STAY PURSUANT TO 28 U.S.C. § 1659(a)

Pursuant to 28 U.S.C. § 1659(a), plaintiffs Ansell Healthcare Products LLC ("Ansell Healthcare") and Ansell Protective Products Inc. ("Ansell Protective Products") respectfully move for a stay of these actions until the determination of the United States International Trade Commission ("ITC") in Inv. No. 337-TA-608 becomes final. The following facts are pertinent:

- Civil Action No. 06-527 (JJF) between Ansell Healthcare and Tillotson Corporation ("Tillotson") involves issues relating to the alleged infringement, validity and enforceability of the U.S. Patent No. Re. 35,616 ("the '616 patent").

- Civil Action No. 07-93 (JJF) between Ansell Protective Products and Tillotson also involves issues relating to the alleged infringement, validity and enforceability of the '616 patent.

- Tillotson is the complainant in Inv. No. 337-TA-608 pending before the ITC which investigation also involves issues relating to the alleged infringement, validity and enforceability of the '616 patent.

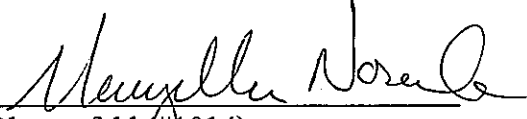
- By Notice published at 72 F.R. 58884 – 58885 on October 17, 2007, Ansell Healthcare and Ansell Protective Products were named as respondents in ITC Inv. No. 337-TA-608, although they have not yet been served with a copy of the Complaint or Amended Complaint.

- This request for stay pursuant to 28 U.S.C. § 1659(a) is made within 30 days after Ansell Healthcare and Ansell Protective Products were named as respondents in ITC Inv. No. 337-TA-608.

Under the facts of this case and in light of this timely request, Ansell Healthcare and Ansell Protective Products have a statutory right to a stay of these proceedings pursuant to 28 U.S.C. § 1659(a). *See In re Princo Corp.*, 478 F.3d 1345, 1355 (Fed. Cir. 2007).

For the foregoing reasons, Ansell Healthcare and Ansell Protective Products respectfully request that these actions be stayed until the determination of the ITC in Inv. No. 337-TA-608, in which they are now named respondents, becomes final. Plaintiffs' counsel has discussed this motion with Tillotson's counsel and understands that Tillotson does not oppose this motion, and both sides concur that at such time as the stay is lifted, a conference with the Court should be held to set a new scheduling order which would address, *inter alia*, additional discovery that may need to be taken in these actions.

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Attorneys for Plaintiffs

*Ansell Healthcare Products LLC and
Ansell Protective Products Inc.*

Dated: November 13, 2007

CERTIFICATE OF SERVICE

I, Maryellen Noreika, hereby certify that on November 13, 2007, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will send notification of such filing to the following:

Richard L. Horwitz, Esquire
Kenneth L. Dorsney, Esquire
POTTER ANDERSON & CORROON LLP

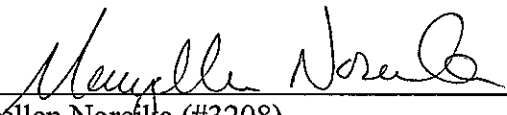
I further certify that copies of the foregoing document were also served upon the following in the manner indicated:

BY ELECTRONIC MAIL and HAND DELIVERY

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[PROPOSED] ORDER

AND NOW, this _____ day of November, 2007, upon consideration of Plaintiffs' Unopposed Motion For Stay Pursuant To 28 U.S.C. § 1659(a), it is hereby ORDERED that said motion is GRANTED. The above-captioned actions are hereby STAYED until the determination of the United States International Trade Commission in Inv. No. 337-TA-608 becomes final or further order of this Court.

J.